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**MEMO ENDORSED**

Stephen A. Katz (MA, NY & PA)

Honorable Nelson S. Roman  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: Hutter v. Countrywide Bank, N.A., Civil Action no. 09-CIV-10092 (NSR) (LMS)

Dear Judge Roman:

As counsel for the plaintiff Nance M. Hutter, I am writing to request a two-week extension of the deadline, until 6 June 2014, for Hutter to serve her opposition to defendant Countrywide Bank's motion for Rule 11 sanctions.

1. The original deadline: Hutter's opposition is currently due on 23 May 2014. She asks that the deadline be extended to 6 June 2014, with Countrywide's reply's being due by 30 June 2014. If Countrywide needs additional time for its reply, Hutter consents to it.

2.-3. The number of previous requests for adjournment or extension, and whether they were granted:

**Hutter:**  
Eight previous requests

17-MAY-2010, docket no. 18 Granted  
31-MAR-2011, docket no. 35 Granted  
06-MAY-2011, docket no. 38 Granted  
15-NOV-2011, docket no. 47 Granted  
19-AUG-2012, docket no. 70 Denied  
08-NOV-2013, docket no. 98 Denied  
16-JAN-2014, docket no. 105 Granted  
28-JAN-2014, docket no. 107 Granted

**Countrywide Bank, N.A.:**  
Six previous requests

23-DEC-2009, docket no. 3 Granted  
05-FEB-2010, docket no. 6 Granted  
29-JUN-2010, docket no. 29 Granted  
04-FEB-2011, docket no. 33 Granted  
03-JUN-2011, docket no. 40 Granted  
13-MAY-2013, docket no. 85 Granted

**Evolution Mortgage Inc.:**  
One previous request

16-DEC-2011, docket no. 52 Granted

**Watermark Capital, Inc.:**  
Two previous requests

13-DEC-2011, docket no. 51 Granted  
13-MAY-2013, docket no. 86 Granted

The application is  granted.  
 denied.

Nelson S. Roman, U.S.D.J.  
Dated: May 23, 2014  
White Plains, New York 10601

22 May 2014

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DATE FILED: <u>5/23/2014</u>

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22 May 2014  
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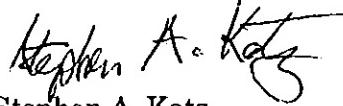
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**4. The reason for the instant request:** Other obligations, including a trial scheduled to start tomorrow, demand my time. Also, to understand Rule 11 thoroughly, I need time to read a number of long decisions and grasp each one's facts. Hutter's opposition, finally, will be more concise if she has more time.

**5.-6. Whether the adversaries consent:** All three defendants consent to Hutter's having till the end of 06-JUN-2014 to serve her opposition to Countrywide's motion for Rule 11 sanctions. The deadline for Countrywide's reply will be 30-JUN-2014, and Hutter consents to its having additional time if it needs it.

Thank you for considering this request.

Sincerely yours,



Stephen A. Katz

SAK  
cc: To all counsel by fax  
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